

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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|---|---|-----------------------------------|
| IN RE: | § | Chapter 11 |
| | § | |
| IGNITE RESTAURANT GROUP, INC., et al., | § | Bankruptcy Case No. 17-33550-DRJ |
| | § | |
| Debtors. | § | (Jointly Administered) |
| ----- | § | |
| DRIVETRAIN, LLC, as Trustee of the Ignite | § | Adversary Proceeding No. 19-03471 |
| Restaurant Group GUC Trust, | § | |
| | § | |
| Plaintiff, | § | |
| | § | |
| v. | § | |
| | § | |
| 1ST SOURCE RESTAURANT SERVICES, | § | |
| INC., | § | |
| | § | |
| Defendant. | § | |

**ANSWER OF 1ST SOURCE RESTAURANT SERVICES, INC. TO COMPLAINT
FOR AVOIDANCE AND RECOVERY OF PREFERENTIAL TRANSFERS**

NOW COMES 1st Source Restaurant Services, Inc. (“Defendant”) and files this Answer to Complaint for Avoidance and Recovery of Preferential Transfers (“Complaint”) filed by Drivetrain, LLC, as Trustee of the Ignite Restaurant Group GUC Trust, (“Plaintiff”) in the above-entitled and numbered adversary proceeding and, in support hereof, shows the Court as follows:

1. Defendant admits the statement of paragraph 1. of the Complaint.
2. Defendant denies the statements of paragraph 2. of the Complaint.
3. Defendant admits the statements of paragraph 3. of the Complaint.
4. Defendant admits the statement of paragraph 4. of the Complaint.
5. Defendant admits the statement of paragraph 5. of the Complaint.
6. Defendant admits the statement of paragraph 6. of the Complaint.

7. Defendant admits the statement of paragraph 7. of the Complaint.
8. Defendant admits the statement of paragraph 8. of the Complaint.
9. Defendant admits the statement of paragraph 9. of the Complaint. Defendant also consents to the entry of a final order or judgment by the Bankruptcy Court.
10. Defendant lacks knowledge of information sufficient to admit or deny the statements of paragraph 10. of the Complaint.
11. Defendant admits the allegations of paragraph 11. of the Complaint.
12. Defendant admits the allegations of paragraph 12. of the Complaint.
13. Paragraph 13. of the Complaint does not require a response.
14. Defendant admits the allegations of paragraph 14. of the Complaint.
15. Defendant admits the allegations of paragraph 15. of the Complaint.
16. Defendant denies the allegations of paragraph 16. of the Complaint.
17. Defendant denies the allegations of paragraph 17. of the Complaint.
18. Defendant denies the allegations of paragraph 18. of the Complaint.
19. Defendant denies the allegations of paragraph 19. of the Complaint.
20. Paragraph 20. of the Complaint does not require a response.
21. Defendant admits the allegation of paragraph 21. of the Complaint.
22. Defendant denies the allegations of paragraph 22. of the Complaint.
23. Defendant denies the allegations of paragraph 23. of the Complaint.


Defendant further denies all of the material allegations in the prayer for relief of the Complaint.

Defendant respectfully requests that this Honorable Court does not enter judgment in favor of Drivetrain, LLC, as Trustee of the Ignite Restaurant Group GUC Trust, against 1st Source Restaurant Services, Inc.

WHEREFORE, Defendant prays that the Complaint be denied and that Defendant be granted such other and further relief, in law or in equity, to which it may show itself justly entitled.

DATED this 27th day of June, 2019.

Respectfully submitted,



Kerry L. Haliburton
State Bar No. 08743400
of
NAMAN, HOWELL, SMITH & LEE, PLLC
P.O. Box 1470
Waco, Texas 76703-1470
(254) 755-4100
FAX (254) 754-6331
Email: haliburton@namanhowell.com

ATTORNEYS FOR DEFENDANT
1ST SOURCE RESTAURANT SERVICES, INC.

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing Answer to Complaint for Avoidance and Recovery of Preferential Transfers has been served by electronic mail, unless not available, otherwise by regular United States Mail, first class, postage fully prepaid, to the attorneys for Plaintiff, Michael D. Warner and Benjamin L. Wallen, Cole Schotz P.C., 301 Commerce Street, Suite 1700, Fort Worth, Texas 76102, and Jason S. Pomerantz and Jeffrey P. Nolan, Pachulski Stang Ziehl & Jones LLP, 10100 Santa Monica Boulevard, 13th Floor, Los Angeles, California 90067; and to the United States Trustee, 515 Rusk Street, Suite 3516, Houston, Texas 77002, all on this 27th day of June, 2019.



Kerry L. Haliburton